

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:)	Chapter 11
)	
OTB HOLDING LLC, <i>et. al.</i> , ¹)	Case No. 25-52415 (SMS)
)	
Debtors.)	(Jointly Administered)
)	
)	Hearing Date: January 13, 2026
)	at 1:00 p.m. ET
)	

NOTICE OF HEARING

PLEASE TAKE NOTICE that META Advisors LLC, solely in its capacity as the liquidating trustee (the “Liquidating Trustee”) of the OTB Holding Liquidating Trust (the “Liquidating Trust”), has filed the *Motion of the Liquidating Trustee for Entry of an Order Extending the Time to Object to Claims* (the “Motion”) and related papers with the Court seeking entry of an order extending the deadline for the Liquidating Trustee to file objections to claims through and including July 13, 2026.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion at **1:00 P.M. ET on January 13, 2026** in Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303, which must be attended in person, unless the Court orders otherwise.

Your rights may be affected by the Court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one. If you do not want the Court to grant the relief sought in the Motion, then

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC’s service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.



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you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: December 22, 2025

EVERSHEDS SUTHERLAND (US) LLP

/s/ Todd C Meyers

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*Counsel to the Liquidating Trustee of the OTB
Holding Liquidating Trust*

UNITED STATES BANKRUPTCY COURT
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**MOTION OF THE LIQUIDATING TRUSTEE FOR ENTRY OF AN ORDER
EXTENDING THE TIME TO OBJECT TO CLAIMS**

META Advisors LLC, solely in its capacity as the liquidating trustee (the “Liquidating Trustee”) of the OTB Holding Liquidating Trust (the “Liquidating Trust”), established through those certain *Findings of Fact, Conclusions of Law, and Order Confirming the Debtors’ Amended Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 607] (the “Confirmation Order”), confirming the *Debtors’ Amended and Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 522] (as amended, supplemented, or modified, the “Plan”),² by and through undersigned counsel, files this motion (this “Motion”) for entry of an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), seeking to extend the deadline for the Liquidating Trustee to object to proofs of claims against the Debtors by one hundred and eighty (180) days, through and including July 13, 2026, pursuant to sections 105(a) and 502 of 11 U.S.C. §§101-1532 (the “Bankruptcy Code”), Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9006-1 of the Local Rules of the United States Bankruptcy Court

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² Capitalized terms used but not defined herein shall have the respective meanings ascribed to them in the Plan.

for the Northern District of Georgia (the “Local Rules”), without prejudice to the Liquidating Trustee’s right to seek additional extensions. In support of this Motion, the Liquidating Trustee respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Further, the Court has jurisdiction over this matter pursuant to section 11 of the Plan.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are sections 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9006, and Rule 9006-1 of the Local Rules.

PERTINENT BACKGROUND

4. On March 4, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the Court (collectively, the “Chapter 11 Cases”).

5. The factual background relating to the Chapter 11 Cases is set forth in the *Declaration of Jonathan M. Tibus in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 18] filed on or about the Petition Date and is incorporated herein by reference.

6. On April 16, 2025, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [Docket No. 259], pursuant to which the Court established, among other things, (i) May 29, 2025 at 5:00 p.m. (prevailing Eastern Time) as the deadline for non-governmental persons or entities to submit claims that arose before the Petition Date against the Debtors, and (ii) October 21, 2025 at 5:00 p.m. (prevailing Eastern Time)

as the deadline for governmental entities to submit claims that arose before the Petition Date against the Debtors. On April 17, 2025, the Debtors filed their Schedules of Assets and Liabilities.

7. On July 21, 2025, the Debtors filed the Plan. On September 8, 2025, the Court entered the Confirmation Order confirming the Plan, and, on September 16, 2025, the Plan became effective according to its terms (the “Effective Date”) [*see* Docket No. 620].

8. The Plan and Confirmation Order provide for, among other things, the creation of the Liquidating Trust and the appointment of the Liquidating Trustee to oversee the Liquidating Trust and administer the Liquidating Trust Assets. *See* Plan § 7.04. On the Effective Date, pursuant to sections 1123(a)(5), 1123(b)(3) and 1141(b) of the Bankruptcy Code, all Liquidating Trust Assets automatically vested in the Liquidating Trust, free and clear of all claims, liens, contractually-imposed restrictions, charges, encumbrances, and Interests of creditors and equity security holders. *See id.* Consequently, the Liquidating Trustee is not only the Debtors’ representative but is also responsible for administering the Liquidating Trust Assets, including making distributions required under the Plan and objecting to claims. *See id.* §§ 7.05, 8.05.

9. The Plan and Confirmation Order provide that the “Claims Objection Deadline” means the later of: (i) one hundred and twenty (120) days after the Effective Date; and (ii) such other date as may be fixed by the Bankruptcy Court. *See* Plan § 1.01. The current Claims Objection Deadline is January 14, 2026. As set forth herein, the Liquidating Trustee submits that adequate cause exists to warrant an extension of the Claims Objection Deadline through and including July 13, 2026.

REQUESTED RELIEF

10. The Liquidating Trustee requests entry of the Proposed Order because an extension of the Claims Objection Deadline is necessary to facilitate a proper and thorough claims reconciliation process.

BASIS FOR RELIEF

11. Pursuant to the Plan and Confirmation Order, the Court may extend the Claims Objection Deadline by entry of an order upon request of the Liquidating Trustee. Plan §§ 1.01, 8.05.

12. The Court is also authorized to extend the Claims Objection Deadline under Bankruptcy Rule 9006, which provides that the Court may extend a time period provided under the Bankruptcy Rules or order of the Court for cause shown, with certain exceptions not applicable here. Fed. R. Bankr. P. 9006(b). Although the Bankruptcy Code does not define “cause,” it has been noted that “courts should be liberal in granting extensions of time sought before the period to act has elapsed, so long as the moving party has not been guilty of negligence or bad faith and the privilege of extension has not been abused.” COLLIER ON BANKRUPTCY ¶ 9006.06[2] (Alan N. Resnick & Henry J. Sommer eds., 16th ed. rev. 2016).

13. Moreover, section 105(a) of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a). It is generally recognized that “[s]ection 105(a) authorizes the bankruptcy court, or the district court sitting in bankruptcy, to fashion such orders as are required to further the substantive provisions of the Bankruptcy Code.” COLLIER ON BANKRUPTCY ¶ 105.04 at 105-15, n.5 (15th ed. rev. 1989).

14. Courts in this district have regularly granted the relief requested herein. *See, e.g., In re Fulcrum Loan Holdings, LLC*, Case No. 24-56114 (Bankr. N.D. Ga. Nov. 4, 2025) [Docket No. 333] (extending claim objection deadline by 60 days); *In re Envistacom, LLC*, Case No. 23-52696 (Bankr. N.D. Ga. Nov. 1, 2024) [Docket No.273] (extending claim objection deadline by 120 days in addition to a previously granted 120-day extension); *In re Clayton General Group, Inc.*, Case No. 15-64266 (Bankr. N.D. Ga. Apr. 23, 2019) [Docket No.1289] (extending claim objection deadline by 60 days in addition to a previously granted 90-day extension).

15. The Liquidating Trustee submits that cause exists to extend the Claims Objection Deadline because the proposed extension is necessary for the proper administration of the Liquidating Trust and is in the best interests of the estates, creditors, and other parties in interest.

16. Since the Effective Date, the Liquidating Trust and its professionals have been, among other tasks, effecting the winddown of the Debtors' estates and administering the Liquidating Trust Assets. Currently, the Liquidating Trustee and its professionals are, among other things: (i) reconciling the more than 1,000 claims filed in these Chapter 11 Cases, including the more than 700 general unsecured claims; (ii) resolving multiple insurance related issues [*see, e.g.* Docket Nos. 627, 628]; and (iii) addressing both requests for relief from the automatic stay and violations of the automatic stay and the Plan's injunction provisions through, among other things, the initiation or continuation of non-bankruptcy litigation.

17. These tasks have required a significant amount of time and attention. In light of the Liquidating Trustee's and its professionals' efforts with respect to these pressing responsibilities, the Liquidating Trustee and its professionals have not had sufficient time to fully evaluate, reconcile, and resolve applicable claims and, where appropriate, to object to the same. This review process is in its preliminary stages. If the Claims Objection Deadline is not extended, invalid,

duplicate, or unsupported claims may be allowed, which may unfairly prejudice holders of valid and supported claims.

18. Therefore, the Liquidating Trustee submits that the extension of the Claims Objection Deadline requested herein is: (i) reasonable and necessary under the circumstances; (ii) well within the range of extensions granted in comparable chapter 11 cases; and (iii) inures to the benefit of creditors and parties in interest. As such, the Liquidating Trustee respectfully requests that the Court grant the proposed extension of the Claims Objection Deadline, without prejudice to its rights to seek a further extension of such deadline.

NO PRIOR REQUEST

19. No prior request for the relief requested herein has been made by the Liquidating Trustee to this or any other court.

NOTICE

20. Notice of this Motion will be provided to (i) the United States Trustee for the Northern District of Georgia; and (ii) the Limited Service List set forth by Kurtzman Carson Consultants, LLC d/b/a Verita Global, the Debtors' claims and noticing agent ("Verita"). The Liquidating Trustee submits that no other or further notice is required.

CONCLUSION

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order extending the Claims Objection Deadline through and including July 13, 2026 without prejudice to the Liquidating Trustee's right to seek further extensions thereof and granting such other and further relief as the Court deems just and proper.

[Signature on next page]

Dated: December 22, 2025

EVERSHEDS SUTHERLAND (US) LLP

/s/ Todd C. Meyers

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*Counsel to the Liquidating Trustee of the OTB
Holding Liquidating Trust*

EXHIBIT A

(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
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Debtors.)	(Jointly Administered)
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**ORDER GRANTING MOTION OF THE LIQUIDATING TRUSTEE FOR ENTRY OF
AN ORDER EXTENDING THE TIME TO OBJECT TO CLAIMS**

Upon consideration of the relief requested in the *Motion of the Liquidating Trustee for Entry of an Order Extending the Time to Object to Claims* (the “Motion”),² pursuant to, among others, sections 105(a) and 502 of the Bankruptcy Code, and Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure, and the authority granted to the Liquidating Trustee pursuant to the Plan and Confirmation Order; and it appearing that the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and section 11 of the Plan; and it appearing that venue of this case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the notice of the Motion as set forth therein is sufficient, and that no other or further notice need be provided; and this Court having found that the relief requested in the Motion is in the best interests of the Liquidating Trust, its beneficiaries, the Debtors’ estates, and all other parties-in-interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC’s service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.

² Capitalized terms used but not defined herein shall have the respective meanings ascribed to them in the Motion.

2. The Claims Objection Deadline is hereby extended through and including July 13, 2026, without prejudice to the right of the Liquidating Trustee to seek further extensions of such deadline.

3. This Order is without prejudice to the rights of the Liquidating Trustee with respect to any and all adversary proceedings and contested matters (or any other actions or proceedings whether ongoing or not yet commenced) regarding claims or causes of action retained by the Liquidating Trust.

4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules are hereby satisfied by such notice.

5. Notwithstanding any Bankruptcy Rule or Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately enforceable upon its entry.

6. The Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this Order.

7. Verita shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first-class mail, as applicable, on all parties served with the Motion, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

Prepared and presented by:

EVERSHEDS SUTHERLAND (US) LLP

/s/

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